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UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

JUSTIN L. TRIPP,

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Plaintiff,

VS.

CLARK COUNTY, et al

Defendants.

CASE NO: 2:17-cv-01964-JCM-BNW

STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO NAPHCARE **DEFENDANTS' MOTION FOR SUMMARY JUDGMENT (ECF #244)** (Second Request)

COMES NOW, Plaintiff Justin Tripp ("Plaintiff"), by and through his counsel, the law firm of Hatfield & Associates., Ltd., appearing pro bono publico, and Defendant NaphCare, Inc., Defendant Harry Duran, M.D., Defendant Eric Lopez, P.A., Defendant Rachel Scheiblich, Defendant Kendra Meyer, and Defendant Raymond Mondora, (hereinafter "NaphCare Defendants"), by and through their counsel, the law firm of Medical Defense Law Group, and hereby stipulate and agree to extend the time for Plaintiff to Respond to the NaphCare Defendants' Motion for Summary Judgment [ECF #244], due on October 28, 2022 to October November 18, 2022.

This request is submitted pursuant to LR IA 6-1, 6-2 and 7-1 and is the parties' second request for an extension of time for Plaintiff to respond to Defendants' Motion for Summary Judgment.

Good cause exists for this extension. Plaintiff is incarcerated in F.C.I. Herlong, in Herlong, California and Plaintiff's Counsel has had difficulty communicating with him. Plaintiff's counsel is requesting an extension of time up to and including November 18, 2022, as Plaintiff requested authority from his incarcerated client to make an offer to resolve this case to Defendants and received that authority and made the offer to Defendants' counsel on October 19, 2022. Defendants responded to the offer on October 25, 2022 with a counteroffer that Plaintiff's counsel needs to convey to Plaintiff. If accepted, the case would then resolve in the entirety whereby the motion may be made moot, but time is needed to convey the counteroffer to Plaintiff.

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Defendants have courteously granted this extension of time for Plaintiff to file his 1 Response. Accordingly, Plaintiff shall have up to and including November 18, 2022, to respond 2 3 to NaphCare Defendants' Motion for Summary Judgment [ECF #244]. DATED this 26th day of October, 2022 DATED this 26th day of October, 2022 5 HATFIELD & ASSOCIATES, LTD. MEDICAL DEFENSE LAW GROUP 6 /s/ Trevor J. Hatfield By:_ /s/ Paul A. Cardinale By: 7 TREVOR J. HATFIELD, ESQ. (SBN 7373) PAUL A. CARDINALE, ESQ. (SBN 8394) 703 S. Eighth Street 3800 Watt Avenue, Suite 245 8 Las Vegas, Nevada 89101 Sacramento, CA 95821 Tel.: (702) 388-4469 9 Email: paul.cardinale@med-defenselaw.com Email: thatfield@hatfieldlawassociates.com Attorney for Plaintiff In Conjunction with **Southern Nevada Office:** 10 Legal Aid Center of Southern Nevada Pro 2965 South Jones Blvd., Suite E1 Bono Project. Las Vegas, NV 89146 11 Tel.: (702) 342-8116 12 Attorneys for NAPHCARE Defendants 13 14 15 16 17 18 **ORDER** 19 IT IS SO ORDERED: 20 Mus C. Mahan UNITED STATES DISTRICT COURT JUDGE 21 Dated: October 28, 2022 22 23 24 25 26 27 28